

Rebecca A. Caley, CBN 131997
Christopher M. Domin, CBN 273951
CALEY & ASSOCIATES
A Professional Corporation
265 S. Randolph Avenue, Suite 270
Brea, California 92821-5777
rcaley@caleylaw.com
714/529-1400 Office
714/529-1515 Facsimile
2030-078

Attorneys for Defendant,
BMW Financial Services NA LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SEUNGTAE KIM, an Individual,)	CASE NO. 2:14-cv-01752-BRO SH
)	
Plaintiff,)	Assigned to Hon. Beverly Reid
)	O'Connell
vs.)	
)	
)	DECLARATION OF REBECCA A.
BMW FINANCIAL SERVICES NA,)	CALEY RE DEFENDANT'S
LLC., a business entity; EQUIFAX)	EXHIBIT LIST
INFORMATION SERVICES LLC, a)	
business entity; EXPERIAN)	
INFORMATION SOLUTIONS, INC.,)	TRIAL DATE: April 21, 2015
a Corporation; TRANSUNION, LLC.,)	
a business entity, and DOES 1-10,)	
Inclusive,)	DATE: March 23, 2015
)	TIME: 3:00 p.m.
Defendants.)	CTRM: 14
)	

I, REBECCA A. CALEY, declare:

1. I am an attorney duly licensed to practice law before this Court and all the courts in the State of California and this United States District Court and am the attorney of record for defendant BMW Financial Services NA, LLC ("BMW FS") in the above entitled matter. I am personally familiar with each of

1 the facts as stated herein and if called as a witness, I could and would
2 competently testify thereto.

3 2. The deadline to file the Joint Exhibit List and Joint Witness List was
4 March 9, 2015. The Joint Witness List was prepared and modified by respective
5 counsel for BMW FS and plaintiff Seungtae Kim ("Plaintiff") and filed by
6 Plaintiff's counsel on March 9, 2015.

7 3. Concerning the Joint Exhibit List, my office received the Joint Exhibit
8 List from Plaintiff's counsel on March 6, 2015, which included Plaintiff's Exhibits
9 1-48. Since my office was unable to reconcile a total of 15 documents designated
10 as Plaintiff's exhibits, my office requested Defendant to either provide copies of
11 the documents or Bate stamp numbers on March 9, 2015. Meanwhile, my office
12 received two additional revised Joint Exhibits Lists from Plaintiff which included
13 24 additional exhibits and another seven additional exhibits in the afternoon.

14 4. While my office was attempting to finalize Defendant's list of exhibits
15 to the Joint Exhibit List and reconcile Plaintiff's exhibits to determine if objections
16 were required, I received an email transmission from Plaintiff's counsel's office
17 on March 9, 2015, at 3:56 pm, that they were filing a separate Plaintiff's Exhibit
18 List. Therefore, since the Joint Exhibit List was no longer possible, Defendant
19 filed its separate exhibit list as well.

20 I declare under penalty of perjury under the laws of the United States of
21 America that the foregoing is true and correct.

22 Executed this 9 day of March, 2015, at Brea, California.

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25 REBECCA A. CALEY
26 Declarant
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